

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION
5:13-cv-00172

JUSTIN HALL, an individual,

Plaintiff,

v.

CHARTER COMMUNICATIONS, INC., a
foreign corporation; and DOES 1 through
10, inclusive,

Defendant.

**DEFENDANT CHARTER
COMMUNICATIONS, INC.'S MOTION
FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S
INTERROGATORIES, PLAINTIFF'S
REQUEST FOR PRODUCTION OF
DOCUMENTS, AND PLAINTIFF'S
REQUEST FOR ADMISSIONS, SET ONE**

Pursuant to Rules 6(b), 26, 33, 34, and 36 of the Federal Rules of Civil Procedure, Defendant Charter Communications, Inc., through counsel, hereby moves this Court for an extension of time of thirty (30) days through July 29, 2014, within which to answer and/or respond to Plaintiff's Interrogatories, Request for Production of Documents and Request for Admissions, Set One in this action.

In support of this motion, the Defendant shows the Court that:

1. The Defendant was served with Plaintiff's Interrogatories, Request for Production of Documents and Request for Admissions, Set One on May 30, 2014.
2. The Defendant's responses to Plaintiff's Interrogatories, Request for Production of Documents and Request for Admissions, Set One are due on June 29, 2014. Accordingly, the time within which the Defendant must answer and/or respond to Plaintiff's Interrogatories, Request for Production of Documents and Request for Admissions has not yet expired.
3. The Defendant requests an extension of time of thirty (30) days through and including July 29, 2014, in order to gather the necessary materials and records to be able to fully respond to Plaintiff's discovery requests.

4. The Defendant's counsel conferred with the Plaintiff's counsel regarding this motion and Plaintiff's counsel indicated he consents to an extension of the discovery response deadline up to and including July 29, 2014.

WHEREFORE, the Defendant prays that this Court extend the period of time within which the Defendant must serve responses to Plaintiff's Interrogatories, Request for Production of Documents and Request for Admissions, Set One for an additional thirty (30) days through and including July 29, 2014.

This 12th day of June, 2014.

CRANFILL SUMNER & HARTZOG LLP

BY: /s/ Samuel H. Poole, Jr.
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing, DEFENDANT CHARTER COMMUNICATION INC.'S MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S INTERROGATORIES, REQUEST FOR PRODUCTION OF DOCUMENTS AND REQUEST FOR ADMISSIONS, SET ONE, with the Clerk of Court using the CM/ECF system which will send notification of such filing to:

Christopher D. Lane, Esq.
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Attorney for Plaintiff

This 12th day of June, 2014.

CRANFILL SUMNER & HARTZOG LLP

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